

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In re:)
GLORIA DEAN FAYNE,) Case No. 16-40984-drd13
Debtor.)
) Chapter 13
GLORIA DEAN FAYNE,)
Plaintiff)
)
v.) Adv. Proc. No. 17-04152-drd
)
INNOVATIONS 365, LLC, and)
CLYDE KING,)
Defendants.)

MOTION FOR WITHDRAWAL OF ATTORNEY

COMES NOW, James R. Crump, counsel of record for Debtor Gloria Dean Fayne, and for his Motion for Withdrawal states to the Court as follows:

1. Local Rule 2091-1 permits withdrawal of an attorney of record where new counsel has entered appearance.
2. The debtor, Gloria Dean Fayne, has consented to the withdrawal of James Crump as her attorney, and for substitution of counsel by Susan Kephart and Jacqueline Domian of Legal Aid of Western Missouri.
3. Susan Kephart entered her appearance in this matter on December 29, 2017, and Jacqueline Domian entered her appearance in this matter on January 3, 2018.
4. This motion is not being filed for the purposes of delay or harassment, nor will the granting of this request by the Court unduly prejudice any party.

WHEREFORE, Counsel James R. Crump prays this Court for an Order for Withdrawal of Counsel, and for such other relief as this Court deems just and proper.

Respectfully Submitted,

/s/ James R. Crump

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I, James R. Crump, hereby certify that on this 8th day of January, 2018, a true and correct copy of the foregoing was filed via electronic transmission with the Clerk of the Court using the ECF System, which sent notification of such filing to the Office of the Trustee and to all parties receiving electronic notice, and that a paper copy of the foregoing Motion was sent via postage paid first-class mail upon all other counsel of record.

/s/ James R. Crump

James R. Crump